

# EXHIBIT 32

September 8, 2020

URGENT REQUEST

U.S. Small Business Administration  
Mississippi District Office  
Business Opportunity Specialist  
210 E. Capitol Street, Suite 900  
Jackson, MS 39201

Subject: 8(a) Competitive Request

Business Opportunity Specialist:

The United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) in Mississippi has a requirement that is currently in the 8(a) program and requires competition due to the dollar value. The requirement is to provide Administrative Support Services throughout the State.

1. A description of the work to be performed.

The USDA Natural Resources Conservation Service (NRCS) requires administrative support services in various NRCS Area and Field Office(s) throughout Mississippi. Detailed information about the requirement is provided in the attached PWS. The contractor shall exhibit the ability to provide geographic flexibility in the provision of services allowing for growth or reduction of the workforce at the various locations listed within this performance work statement. USDA NRCS in Mississippi has 74 counties throughout the state. Contract employees will be required to work in multiple counties as determined by NRCS. Mississippi NRCS desires to complement existing professional staff by reducing the clerical tasks for staff. By employing a contractor Mississippi NRCS staff will be able to assist more clients with technical aspects and not tie up professional staff assembling files, reviewing forms, application data, creating and maintaining spreadsheets, etc. Mississippi NRCS wishes to establish a task order for this service and the task order will be for one (1) base year and four (4) one (1) year option periods.

2. The estimated period of performance (POP).

Base plus four (4) Option Periods

Base Period: 11/05/2020 – 11/04/2021  
Option Period 1: 11/05/2021 – 11/04/2022  
Option Period 2: 11/05/2022 – 11/04/2023  
Option Period 3: 11/05/2023 – 11/04/2024  
Option Period 4: 11/05/2024 – 11/04/2025

3. The NAICS code that applies to the principal nature of the acquisition.

561110 Office Administrative Services.

4. The anticipated dollar value of the requirement, including options, if any.

The estimated cost of the contract is estimated at:

Base Year:	\$1,930,740.00
Option Year One:	\$1,988,662.20
Option Year Two:	\$2,048,322.07
Option Year Three:	\$2,109,771.73
Option Year Four:	\$2,173,064.88
Total Estimated Cost:	\$10,250,560.87

\*includes a 3% escalation each year

5. Any special restrictions or geographical limitations on the requirement.

None.

6. The location of the work to be performed.

The work is to be performed state-wide in Mississippi.

7. Any special capabilities or disciplines needed for contract performance.

The ability to mobilize and commence performance at the beginning of the contract period is imperative.

8. The type of contract to be awarded.

A firm fixed price General Services Administration (GSA) Task Order.

9. The acquisition history, if any, of the requirement.

This requirement was previously awarded under 121A2318P0184 to All-Pro Placement Service, Inc. This vendor has graduated from the 8a program. The requirement was for one base year and one option year.

NRCS utilizes these services in several states across the nation. A mix of approaches has been used for these services in the past. Procurements have included orders against GSA schedules, open market purchase orders. NRCS has similar requirements in several other states that will be Set-Aside for Small Business. There will be no adverse impact to small business as defined in 13CFR124.504(c).

10. The names and addresses of any small business contractors which have performed on this requirement during the previous 24 months.

All-Pro Placement Services, Inc.

116 Old Padonia Road, Suite D  
Cockeysville, MD 21030-4930

11. Bonding requirements, if applicable.

None.

12. Identification of all Participants which have expressed an interest in being considered for the acquisition.

There are multiple vendors on GSA schedule, who could quote for this requirement.

13. Identification of all SBA field offices which have requested that the requirement be awarded through the 8(a) BD program.

N/A

In accordance with the Partnership Agreement (PA) between the Small Business Administration (SBA) and the United States Department of Agriculture, I am seeking the SBA's acceptance of to solicit competitively this requirement as an 8a on GSA schedule Multiple Award Schedule 541611.

Per the USDA and SBA memorandum of understanding (MOU) SBA will accept or reject this request within five (5) working days of receipt of this correspondence.

My contact information is 816-926-1200 or via email at [julie.simpson@usda.gov](mailto:julie.simpson@usda.gov)

Sincerely,



Julie M. Simpson  
Contract Specialist

**Velez-Olivieri, Oriel - FPAC-BC, San Juan, PR**

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**From:** Yochim, Thomas F. <Thomas.Yochim@sba.gov>  
**Sent:** Wednesday, May 20, 2020 9:39 AM  
**To:** Velez-Olivieri, Oriel - FPAC-BC, San Juan, PR; Brinkley, Maureen E.  
**Cc:** Steuber, Joe - NRCS, Columbia, MO; Fiske, Andrew - FPAC-BC, Raleigh, NC  
**Subject:** RE: Request for Approval 8a - Mission Support MO

Ms. Oriel Vélez-Olivieri,

Pursuant to Section 8(a) of the Small Business Act [15 USC 637(a)] and Partnership Agreement between the Department of the Defense and the Small Business Administration (SBA), we cannot accept the requirement for USDA Natural Resources Conservation in Missouri on behalf of Accounting Legal Logistics Solutions, an eligible socially and economically disadvantaged concern. The government estimate for this requirement is \$1,005,000.

Accounting Legal Logistics Services is in the Program Year 8 of the 8(a) program and determined to not have met its competitive business mix of 8(a) and non-8a contract revenue. For this reason, Accounting Legal Logistics Solutions is under a restriction of sole source contracts under the 8(a) program. Unfortunately, we cannot accept the subject offer for them at this time on behalf of Accounting Legal Logistics Solutions. Accounting Legal Logistics Solutions sole source restriction will be re-evaluated in August 2020 at time of their annual review.

We have reviewed the St. Louis District 8(a) Portfolio but have we do not have any other firms with the approved NAICS to perform the work. I do apologize for the additional time this has taken. Please let me know if you have any further questions.

If you have any questions regarding this matter, please contact me, Thomas Yochim, at: 314-539-6615 or via E-mail to [thomas.yochim@sba.gov](mailto:thomas.yochim@sba.gov).

Thank you for your continued support of the 8(a) BD Program.

Sincerely,

Thomas Yochim  
Deputy District Director  
St. Louis District Office  
**U.S. Small Business Administration**  
314-539-6615  
[thomas.yochim@sba.gov](mailto:thomas.yochim@sba.gov)

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**From:** Velez-Olivieri, Oriel - FPAC-BC, San Juan, PR <[oriel.velez@usda.gov](mailto:oriel.velez@usda.gov)>  
**Sent:** Monday, May 18, 2020 9:49 AM  
**To:** Yochim, Thomas F. <[Thomas.Yochim@sba.gov](mailto:Thomas.Yochim@sba.gov)>; Brinkley, Maureen E. <[maureen.brinkley@sba.gov](mailto:maureen.brinkley@sba.gov)>



September 3, 2020

U.S. Small Business Administration  
Attn: Cody Neville  
Business Opportunity Specialist  
Utah District Office  
9690 South 300 West, MCPC 101  
Sandy, UT 84070

8(a) Sole Source Request for Avalon Business Engineering Services, LLC

Dear Mr. Neville:

In accordance with FAR 19.804-2, the following is submitted for approval.

The USDA, Natural Resources Conservation Service has a requirement for Mission Support Administrative Services for the USDA NRCS Missouri State Office. The Statement of Work for the support services is enclosed. FPAC – BC proposes to set-aside this requirement for an award under the sole source 8(a) program, and to negotiate a Firm-Fixed-Price service contract from:

Avalon Business Engineering Services LLC, 1020 University Park Blvd Ste 200 Clearfield UT 84015

1. A description of the work to be performed.

The USDA NRCS Missouri State Office is in the need to obtain mission support administrative services. The individuals will be assisting professional staff with the implementation and management of NRCS programs and operations.

2. The estimated period of performance (POP).

1-year award from October 1, 2020 – September 30, 2021

3. The NAICS code that applies to the principal nature of the acquisition.

561110 - Office Administrative Services

4. The anticipated dollar value of the requirement, including options, if any.

USDA NRCS will negotiate a firm fixed price commercial services contract. The cost of the contract is estimated at \$2,203,000.00.

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5. Any special restrictions or geographical limitations on the requirement.

The performance of this work will be at the USDA NRCS Missouri State Office, Columbia, MO

6. The location of the work to be performed:

USDA NRCS Missouri State Office, Columbia

7. Any special capabilities or disciplines needed for contract performance.

Addressed in the SOW

8. The type of contract to be awarded, such as firm fixed price, cost reimbursement, or time and materials.

The USDA FPAC BC will negotiate a Firm Fixed Price commercial services contract

9. The acquisition history, if any, of the requirement.

N/A

10. The names and addresses of any small business contractors which have performed on this requirement during the previous 24 months.

Accounting Legal Logistics Solutions, Inc.  
4005 McRee Avenue  
St. Louis, MO 63110-2425

11. A statement that prior to the offering no solicitation for the specific acquisition has been issued as a small business set-aside, or as a small disadvantaged business set-aside if applicable, and that no other public communication (such as a notice in FBO) has been made showing the procuring activity's clear intent to use any of these means of procurement.

No prior solicitation or public communication has been made for this procurement.

12. Identification of any specific Participant that the procuring activity contracting officer nominates for award of a sole source 8(a) contract, if appropriate, including a brief justification for the nomination, such as one of the following: (i) The Participant, through its own efforts, marketed the requirement and caused it to be reserved for the 8(a) BD program; or (ii) The acquisition is a follow-on or renewal contract and the nominated concern is the incumbent.

The nominee is currently performing similar work at the Utah VA and has the capability and resources to perform the work in Missouri.

13. Bonding requirements, if applicable.

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NA

14. Identification of all Participants which have expressed an interest in being considered for the acquisition.

At this point there are no participants that have expressed interest in this project.

15. Identification of all SBA field offices which have requested that the requirement be awarded through the 8(a) SBD program.

Utah District Office

16. A request, if appropriate, that a requirement whose estimated contract value is under the applicable competitive threshold be awarded as an 8(a) competitive contract.

N/A

17. Any other information that the procuring activity deems relevant or which SBA requests.

N/A

In accordance with the Partnership Agreement (PA) between the Small Business Administration (SBA) and the United States Department of Agriculture as described in paragraphs 19.800 and 19.804-2 of the Federal Acquisition Regulation (FAR), I am seeking the SBA's acceptance of my nomination of Avalon Business Engineering Services LLC to provide the above described services on a sole source basis.

If you approve this request, please include size verification and your determination that Avalon Business Engineering Services LLC currently possesses 8(a) program eligibility.

FAR 19.804-3 prescribes that the SBA will accept or reject this offering of Avalon Business Engineering Services LLC within ten (10) working days of receipt of this correspondence.

My contact information is 907-761-7744 or [ryan.lorimer@usda.gov](mailto:ryan.lorimer@usda.gov).

Sincerely,

**RYAN LORIMER**

Digitally signed by RYAN  
LORIMER  
Date: 2020.09.03 13:36:23  
-08'00'

Ryan Lorimer  
Contracting Officer

USDA is an equal opportunity provider, employer, and lender.



April 20, 2020

Winsay, Inc.  
PO Box 55  
Harlem, GA 30814-5330

Subject: Contract AG-5D21-C-15-0001 (Michigan) Expiration and Non-Displacement of  
Qualified Worker

1. As you know, Contract AG-5D21-C-15-0001 is expiring on April 30, 2020. This requirement must continue under the 8(a) Small Business Development Program unless SBA agrees to release. As your 8(a) certification has expired and no release has been given by the SBA, we must continue this requirement with an 8(a) certified firm.
2. The one Administrative Support Position under this contract is to be transitioned to a firm approved by the SBA for participation in the 8(a) Small Business Development Program after the expiration of current contract. Your contract expires 04/30/2020 and must be transitioned.
3. Under FAR 52.222-17, Non-Displacement of qualified workers, the incoming contractor must review the incumbent workers and determine if a job offer will be made. To accomplish this, I need a complete list from your company that provides the person's name, hourly pay rate, location, and length of time with the company for computation of fringe benefits. This list will be provided to the incoming contractor for their new contract and the smooth transition of requirements under the USDA-NRCS.
4. Please forward this information to my email at [julie.simpson@usda.gov](mailto:julie.simpson@usda.gov) as soon as possible.

Your efforts in the transition is greatly appreciated. If you have any questions, please feel free to either email me or call me at 816-926-1200.

Sincerely,



Julie Simpson  
Contract Specialist  
Farm Production and Conservation (FPAC) Business Center  
Acquisition Division

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September 3, 2020

U.S. Small Business Administration  
Virginia District Office  
Business Opportunity Specialist  
400 North 8<sup>th</sup> Street, Suite 1150  
Richmond, VA

Subject: 8(a) Sole Source Request for Heartland Energy Partners, LLC, DUNS # 832880913

Business Opportunity Specialist:

The United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) has identified Heartland Energy Partners, LLC, an 8(a), SDVOSB firm located at 6720 Curran Street, McLean, VA 22101, as a sole source candidate to provide Administrative and Farm Bill Support Services for the USDA-NRCS Virginia.

1. A description of the work to be performed.

The contractors assigned to the Smithfield Area Office, the Christiansburg Area Office, the Louisa Service Center, and the Strasburg Service Center will provide support for the following services:

- Assisting the District Conservationist and other staff with activities that support NRCS financial assistance programs through the Farm Bill, and other items as determined necessary throughout the course of the award.
- Examining Farm Bill contract files to confirm that each document is complete and updating where information is lacking; entering contract data and electronic copies of documents into agency-specific software programs, such as Document Management System (DMS) through a variety of methods including data entry and scanning. Files will be organized according to NRCS policy.
- Updating agreement and other files, as well as maintaining documents in case files and agency specific electronic files.
- Assisting with documents and correspondence related to contract administration, including contract implementation, status reviews, contract modifications, and potential cancellations or terminations.
- Assisting with gathering documents related to data calls and financial and programmatic audits.
- Preparing reports based on requests for statistical or informative material regarding NRCS programs, obtaining information from tracking software, files, and through knowledge of technical staff.
- Assisting various service centers within the designated area, as necessary.

2. The estimated period of performance (POP).

Base plus one (1) Option Periods:  
Base Period (10/01/2020 – 09/30/2021)  
Option Period One (10/01/2021 – 09/30/2022)

3. The NAICS code that applies to the principal nature of the acquisition.

561110 Office Administrative Services.

4. The anticipated dollar value of the requirement, including options, if any.

USDA NRCS will negotiate a firm fixed price commercial services contract. The cost of the contract is estimated at approximately \$140,447.34 per year and \$280,894.68 total.

5. Any special restrictions or geographical limitations on the requirement.

None.

6. The location of the work to be performed.

The work is to be performed state-wide in Virginia.

7. Any special capabilities or disciplines needed for contract performance.

The ability to mobilize and commence performance right away is imperative. The firm identified has confirmed that they have both the capability and expertise to perform the necessary duties.

8. The type of contract to be awarded.

A firm fixed price contract.

9. The acquisition history, if any, of the requirement.

This is a continuing requirement previously awarded to Lewis-Price, who has since graduated the 8(a) program. The NRCS utilizes these services in several states across the nation. A mix of approaches has been used for these services in the past. Procurements have included orders against GSA schedules, open market purchase orders, and most recently a National IDIQ. There will be no adverse impact to small business as defined in 13CFR124.504(c).

10. The names and addresses of any small business contractors which have performed on this requirement during the previous 24 months.

Lewis-Price & Associates, Inc  
8200 Greensboro Dr Ste 805  
McLean, VA 22102-4925  
DUNS: 132086633

11. A statement that prior to the offering no solicitation for the specific acquisition has been issued as a small business set-aside, or as a small disadvantaged business set-aside if applicable, and that no other public communication (such as a notice in the Commerce Business Daily) has

been made showing the procuring activity's clear intent to use any of these means of procurement.

No prior solicitation or other public communication has been made for this requirement.

12. Identification of any specific Participant that the procuring activity contracting officer nominates for award of a sole source 8(a) contract, if appropriate, including a brief justification for the nomination, such as one of the following: (i) The Participant, through its own efforts, marketed the requirement and caused it to be reserved for the 8(a) BD program; or (ii) The acquisition is a new requirement.

HEARTLAND ENGERGY  
6720 CURRAN STREET  
MCLEAN VA 22101

13. Bonding requirements, if applicable.

None.

14. Identification of all Participants which have expressed an interest in being considered for the acquisition.

Heartland Energy Partners, LLC

15. Identification of all SBA field offices which have requested that the requirement be awarded through the 8(a) BD program.

N/A

16. A request, if appropriate, that a requirement whose estimated contract value is under the applicable competitive threshold be awarded as an 8(a) competitive contract.

Waiver request denied 09/02/2020.

17. Any other information that the procuring activity deems relevant or which SBA requests.

N/A

In accordance with the Partnership Agreement (PA) between the Small Business Administration (SBA) and the United States Department of Agriculture as described in paragraphs 19.800 and 19.804-2 of the Federal Acquisition Regulation (FAR), I am seeking the SBA's acceptance of my nomination of Heartland Energy Partners, LLC to provide the above described services on a sole source basis.

If you approve this request, please include size verification and your determination that Heartland Energy Partners, LLC currently possesses 8(a) program eligibility. FAR 19.804-3

prescribes that the SBA will accept or reject this offering of Heartland Energy Partners, LLC within five (5) working days of receipt of this correspondence.

My contact information is 816-926-6156, Kristin.gilliland@usda.gov.

Sincerely,

**KRISTIN GILLILAND**

Digitally signed by KRISTIN GILLILAND  
Date: 2020.09.03 10:32:44 -05'00'

Kristin Gilliland  
Contracting Officer

August 24, 2021

U.S. Small Business Administration  
Attn: Lisa Avila  
Business Opportunity Specialist,  
Washington Metropolitan Area District Office  
409 3<sup>rd</sup> Street SW, Floor 2  
Washington, DC 20416

Dear Ms. Avila:

Subject: Sole Source 8(a) Request for Administrative Support Services

In accordance with FAR 19.804-4, the following is submitted for approval.

1. The USDA-Natural Resources Conservation Service has a requirement to procure Administrative Support Services for the Virginia State Office. The Performance Work Statement (PWS) is provided as an enclosure. Farm Production and Conservation – Raleigh Business Center proposes to set-aside and negotiate a Firm-Fixed-Price service contract award under the sole source 8(a) program to: **PCI Government Services LLC**.

DESCRIPTION. Provide administrative and programmatic support services to offices in the State of Virginia (Richmond, Virginia).

Classification: 01113 General Clerk III

2. The period of performance will include one (1) 13-month base period, beginning September 2021, and includes one (1) calendar year option period.

ESTIMATED TIMELINE.

Base Year (13 Months): September 1, 2021 – September 30, 2022

Option Year 1: October 1, 2022 – September 30, 2023

3. The NAICS code that is applicable to this acquisition is 561110 Office Administrative Services, with a size standard of \$8.0 million.
4. The USDA FPAC will negotiate a firm fixed price commercial services contract. The value of the contract is estimated at \$140,120.00 for the base and all option years. This cost includes a separate line item designated for Travel/Training.

PERFORMANCE PERIOD. (IGCE)

Base Period: \$72,240.00

Option Year 1 Period: \$67,080.00

Travel/Training\*: \$400 per each performance period = \$800.00

\*estimated by the Government as a ceiling price.

TOTAL: \$140,120.00

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5. There are no special restrictions or geographical limitations for this requirement. The contractor employee will be required to work in the following NRCS Virginia State Office, **Henrico County**  
Virginia State Office, Richmond, VA 23229
6. The selected 8(a) firm is deemed to be capable of providing the services described in the enclosed Performance Work Statement.
7. A firm-fixed priced contract is anticipated and award on a direct 8(a) sole source basis.
8. The service is currently contracted under the 8(a) program with Lewis Price & Associates, Inc. The incumbent has graduated from the 8(a) program (July 2021) and the contract will not be extended beyond the August 31, 2021 expiration.
9. No prior solicitation or public communication has been made for this procurement.
10. The acquisition is a follow-on or renewal contract and the nominated concern is:  
PCI Government Services LLC (DUNS: 117165711)  
11921 Freedom Drive, Suite 550  
Reston, VA 20190-5635
11. No bonding requirements exist.
12. PCI Government Services LLC has expressed interest in this project.
13. Washington Metro Area District Office SBA has fielded the requirement for award through the 8(a) SBD program.
14. It is recommended that this acquisition be pursued on a sole source basis with the contractor nominated herein.

In accordance with the Partnership Agreement (PA) between the Small Business Administration (SBA) and the United States Department of Agriculture as described in paragraphs 19.800 and 19.804-2 of the Federal Acquisition Regulation (FAR), I am seeking the SBA's acceptance of my nomination of PCI Government Services LLC to provide the above described services on a sole source basis.

If you approve of this request, please include size verification and your determination that PCI Government Services LLC currently possesses 8(a) program eligibility.

This requirement is below the Simplified Acquisition Threshold (SAT). In accordance with the Partnership Agreement between and USDA, SBA will respond to this offering within two (2) working days of receipt of this correspondence. Upon SBA Acceptance, the Contracting Officer will solicit a quotation, conduct negotiations, if required, and make award direct to the 8(a) firm. A copy of the Purchase Order (PO) will be sent to you after award.

Should additional information be required, please contact Contract Specialist, Ms. Vickie Grant, at Vickie.grant@usda.gov or the undersigned at Amy.stonebraker@usda.gov.

Sincerely,

*Amy D Stonebraker*

Amy Stonebraker  
Contracting Officer

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